```
1
                        UNITED STATES DISTRICT COURT
 2
                   FOR THE CENTRAL DISTRICT OF CALIFORNIA
 3
 4
      SHELDON LOCKETT; MICHELLE
                                         ) CASE NO.
      DAVIS; AND CLYDE DAVIS,
                                         ) 2:18-CV-5838-PJW
 5
                           PLAINTIFFS,
 6
                     VS.
 7
 8
      COUNTY OF LOS ANGELES, A
      PUBLIC ENTITY; LOS ANGELES
 9
      COUNTY SHERIFF'S
      DEPARTMENT, A LAW ENFORCEMENT
10
      AGENCY; SHERIFF JIM
      MCDONNELL; MIZRAIN ORREGO, A
11
      DEPUTY LOS ANGELES COUNTY SHERIFF; )
      SAMUEL ALDAMA, A DEPUTY LOS
12
      ANGELES COUNTY SHERIFF; AND DOES 1 )
      THROUGH 100, INCLUSIVE,
13
                           DEFENDANTS.
14
15
16
                 *** TRANSCRIPT SEALED PER COURT ORDER ***
               VIDEOTAPED DEPOSITION OF DEPUTY ROGELIO BENZOR
17
18
                           LOS ANGELES, CALIFORNIA
19
                            MONDAY, MARCH 2, 2020
20
      JOB NO. 3983123-1
21
22
      REPORTED STENOGRAPHICALLY BY:
23
      ELIZABETH SCHMIDT
      CSR NO. 13598
24
25
      PAGES 1 - 125
                                                         Page 1
```

```
UNITED STATES DISTRICT COURT
1
 2
                  FOR THE CENTRAL DISTRICT OF CALIFORNIA
 3
 4
      SHELDON LOCKETT; MICHELLE
                                         ) CASE NO.
      DAVIS; AND CLYDE DAVIS,
                                          ) 18-CV-5838-PJW
 5
                           PLAINTIFFS,
 6
                     VS.
 7
 8
      COUNTY OF LOS ANGELES, A
      PUBLIC ENTITY; LOS ANGELES
9
      COUNTY SHERIFF'S
      DEPARTMENT, A LAW ENFORCEMENT
      AGENCY; SHERIFF JIM
10
      MCDONNELL; MIZRAIN ORREGO, A
11
      DEPUTY LOS ANGELES COUNTY SHERIFF; )
      SAMUEL ALDAMA, A DEPUTY LOS
      ANGELES COUNTY SHERIFF; AND DOES 1 )
12.
      THROUGH 100, INCLUSIVE,
13
                           DEFENDANTS.
14
15
16
17
18
19
             VIDEOTAPED DEPOSITION OF DEPUTY ROGELIO
      BENZOR, TAKEN ON BEHALF OF PLAINTIFF, AT 444 SOUTH
20
21
      FLOWER STREET, SUITE 1800, LOS ANGELES, CALIFORNIA,
      BEGINNING AT 10:20 A.M. AND ENDING AT 3:33 P.M., ON
2.2.
23
      MARCH 2, 2020, BEFORE ELIZABETH SCHMIDT, CERTIFIED
24
      SHORTHAND REPORTER NO. 13598.
25
                                                    Page 2
```

1	Q You've never seen it since that day?	
2	A No. I I've seen the design, but I've	
3	never seen the tattoo.	
4	Q Okay. Do you have a tattoo like that?	
5	A I have a tattoo similar to this.	11:30
6	Q Okay. All right. Where is that tattoo?	
7	A On my right leg.	
8	Q Is it on your right calf?	
9	A Yeah. Kind of the same area.	
10	Q When did you get that tattoo?	11:30
11	A Either late January or early February of	
12	2016.	
13	Q Around 2016?	
14	A Yes.	
15	Q How many persons have that tattoo at the	11:30
16	Compton Station?	
17	MR. ALTURA: I'll just object to the	
18	extent that the answer to the question calls for the	
19	disclosure of attorney-client information.	
20	BY MR. SWEENEY:	11:31
21	Q How many persons that you know of have	
22	that tatoo at Compton Station?	
23	MR. ALTURA: I'll just object again on the	
24	grounds that that answer may call for the disclosure	
25	of attorney-client privileged information.	11:31
		Page 56

1	THE WITNESS: I can't say confidently. I	
2	don't know, sir.	
3	BY MR. SWEENEY:	
4	Q Give me your best estimate.	
5	A I don't have a estimate.	11:31
6	Q Were you aware that a United States	
7	District Court magistrate judge ruled that you must	
8	answer my questions about the tattoo that is	
9	presented before you in Exhibit 51 with truth?	
10	A Yes, sir.	11:31
11	Q I'm going to ask you again.	
12	MR. IVIE: So Counsel, let me just	
13	clarify. How you instructed the witness I think is	
14	inappropriate. The judge did not make any	
15	particular ruling on any particular question that	11:32
16	may be put to this witness. He did not rule one way	
17	or another on the question that you just asked,	
18	which the witness I thought appropriately answered.	
19	So I think your statement is an effort to	
20	mislead and somewhat intimidate the witness. The	11:32
21	witness answered the question. So that's my	
22	objection.	
23	MR. SWEENEY: Okay. Thank you. All	
24	right.	
25	///	11:32
	Page	: 57

1	BY MR. SWEENEY:	
2	Q Do you know of any other deputy who has	
3	this tattoo?	
4	A I know	
5	MR. IVIE: Other than what you may have	11:32
6	learned from counsel. Do you have any knowledge	
7	independent of anything that you may have been told	
8	by counsel.	
9	THE WITNESS: No.	
10	BY MR. SWEENEY:	11:32
11	Q Isn't it true that the name of the group	
12	of deputies who had that tattoo that's sitting	
13	before you in Exhibit 51 is the Executioners?	
14	MR. IVIE: Object to the question as	
15	lacking foundation that there is a group, that that	11:33
16	group has a name.	
17	THE WITNESS: So I've never heard the term	
18	"Executioner."	
19	BY MR. SWEENEY:	
20	Q You've never heard of the term	11:33
21	"Executioners" in referring to a group of deputies	
22	who have that tattoo?	
23	MR. IVIE: Objection. No foundation that	
24	there is a group, and there's no foundation that	
25	there's a group specifically that is gathered around	11:33
		Page 58

1	this particular tattoo.	
2	But if you know the answer to the	
3	question, you can answer it.	
4	THE WITNESS: No. I've never heard that	
5	term, sir.	11:33
6	BY MR. SWEENEY:	
7	Q What is the name of the term strike	
8	that.	
9	What is the name that you know as being	
10	connected with this tattoo?	11:33
11	MR. IVIE: Objection. That assumes a fact	
12	that has not been established.	
13	THE WITNESS: There's no term for my	
14	tattoo.	
15	BY MR. SWEENEY:	11:34
16	Q No term for the group?	
17	MR. IVIE: Again, objection. There's no	
18	foundation that there's any group.	
19	BY MR. SWEENEY:	
20	Q Now, are you familiar you need some	11:34
21	more water?	
22	A I got this one, sir. Thank you.	
23	Q Are you familiar with the term sheriff	
24	Los Angeles County sheriff cliques?	
25	A I've read about it, yes.	11:34
		Page 59

1	Q What did you read about them?	
2	A The news articles.	
3	Q Okay. In what paper?	
4	A Several. Whichever one pops up, sir.	
5	Q Okay. And you realize there have been	11:34
6	several cliques that have existed within the Los	
7	Angeles County Sheriff's Department since the 1970s;	
8	correct?	
9	MR. IVIE: Object to the question as as	
10	lacking foundation and assumes a fact that has not	11:35
11	been established.	
12	THE WITNESS: Can you repeat the question.	
13	BY MR. SWEENEY:	
14	Q Yes. You've learned in reading the	
15	articles that you mentioned that there have been	11:35
16	several cliques in the Los Angeles County Sheriff's	
17	Department for many years going back to the '70s;	
18	correct?	
19	MR. IVIE: So object to the question. It	
20	seeks to have the witness verify the truth of	11:35
21	articles that he may have read. That lacks	
22	foundation.	
23	BY MR. SWEENEY:	
24	Q You can answer.	
25	A I vaguely remember reading articles	11:35
		Page 60

1	talking about sheriff department cliques.	
2	Q Talking about what?	
3	A Sheriff department cliques.	
4	Q You've heard the names like Vikings;	
5	correct?	11:36
6	A I've heard that term.	
7	Q Little Devils; correct?	
8	A I've never heard that term.	
9	Q Cavemen?	
10	A I've heard that term.	11:36
11	Q Jump Out Boys?	
12	A I've heard that term.	
13	Q Vikings? I think you mentioned Vikings;	
14	right?	
15	A Yes. I've heard of most of those terms,	11:36
16	but I don't know anything about them.	
17	Q Sure. I'm asking questions. You've heard	
18	of the one in your area where you grew up termed as	
19	the Banditos?	
20	A I've recently heard about them.	11:36
21	Q And it's your testimony that this Compton	
22	tattoo, the group does not have a name?	
23	MR. IVIE: Object. Counsel, there's been	
24	no foundation that there is a group to which a name	
25	could be attached. That question has been asked and	11:37
		Page 61

1	answered previously.		
2	BY MR. SWEENEY:		
3	You can answer the question.		
4	A I don't know of any group.		
5	Q Name. You don't know of any name. That's	11:37	
6	<pre>your testimony?</pre>		
7	A I don't know of any group or any group		
8	that calls themselves the Executioners.		
9	Q I'm going to represent to you strike		
10	that.		
11	Do you know Samuel Aldama?		
12	A Yes.		
13	Q When did you first meet Samuel Aldama?		
14	A At Compton Station.		
15	Q What year?	11:37	
16	A 2015.		
17	Q 2015?		
18	A Yeah.		
19	Q And I'm sure you know he testified there		
20	are 10 to 20 deputies at the Compton Station that	11:37	
21	had that tattoo.		
22	MR. IVIE: Object to the question as		
23	lacking foundation, asserts a fact that has not been		
24	established regarding what the witness's knowledge		
25	is or where he may have obtained it. So and I	11:38	
		Page 62	

1	would further object on the grounds that the
2	question may seek attorney-client may seek to
3	intrude to attorney-client communications.
4	If you answer that question, please do not
5	reference any information you may have obtained from 11:38
6	communications with your counsel. Do you understand
7	that?
8	THE WITNESS: Yes.
9	Can you repeat the question.
10	MR. IVIE: Can we have it read back, 11:38
11	please.
12	(Record read as follows:
13	"Question: And I'm sure you know
14	he testified there are 10 to 20
15	deputies at the Compton Station that
16	had that tattoo.")
17	BY MR. SWEENEY:
18	Q Did you know that?
19	A I read that in the article.
20	Q Do you agree with that? 11:39
21	A No.
22	Q Why don't you agree with that?
23	A Because there's no while I was there,
24	there's no evidence to to prove that.
25	Q Did you do a search? 11:39
	Page 63

1		A	No.	
2		Q	So it's you who's never seen anyone else	
3	with	that	tattoo; is that correct?	
4		A	Correct.	
5		Q	Where did you get that tattoo?	11:39
6		A	I got it in the city of Hollywood.	
7		Q)	City of Hollywood?	
8		A	Yes.	
9		Q	What street?	
10		A	Either on Hollywood Boulevard or Sunset	11:39
11	Boule	evard		
12		Q	What's the name of the tattoo shop?	
13		A	Sir, I don't recall the name.	
14		Q	What's the name of the tattoo artist?	
15		A	I didn't know him. I was a walk-in.	11:40
16		Q	What's that?	
17		A	I didn't know him. I was a walk-in.	
18		Q	You were a walk-in. What month did you	
19	get :	it?		
20		A	Either January or February of 2016.	11:40
21		Q	You got it after you transported Immunique	
22	Ross	from	Martin Luther King Hospital to the area	
23	where	e she	identified Sheldon Lockett; correct?	
24		A	I believe so.	
25		Q	How much did that tattoo cost you?	11:40
				Page 64

1	A Roughly around \$500.	
2	Q You said you were a walk-in to this tattoo	
3	shop?	
4	A I was a walk-in.	
5	Q A walk-in?	11:41
6	A Yes. No appointment.	
7	Q How did you find out about it? Were you	
8	just driving down Hollywood or Sunset Boulevard and	
9	just decided I'll choose that? How did you find out	
10	about it?	11:41
11	A I didn't find out about it. It was a I	
12	was thinking of getting a piece of art that	
13	signified and represented my time at Compton	
14	Station. So I was thinking about it for a while,	
15	and I wasn't just set on this tattoo. (I was	11:41
16	thinking I was thinking of a lot of different	
17	designs. I was thinking of the thin blue flag, the	
18	St. Michael.	
19	But as far as to answer your question,	
20	sir	11:42
21	Q By the way, I'm going to object as being	
22	nonresponsive. Please answer my question. Thank	
23	you.	
24	A Okay.	
25	MR. IVIE: Well, let's have the	11:42
	Pag	ge 65

1	question do you remember the question?
2	THE WITNESS: Can I have it repeated back
3	to me?
4	MR. IVIE: Let's have the question read
5	back, please. 11:42
6	MR. SWEENEY: I'll rephrase it.
7	BY MR. SWEENEY:
8	Q How did you choose that shop?
9	A It presented itself in front of me. It
10	was the closest shop. 11:42
11	Q Okay. You weren't referred to that shop?
12	A No.
13	Q Okay. No one said go to the shop on
14	Sunset or Hollywood Boulevard to get this tattoo?
15	A No. 11:42
16	Q Your tattoo is similar to the one in 51?
17	A Yes.
18	Q Pretty much the same; correct?
19	A The shades may be different, but yeah.
20	Q Do you know how the tattoo artist knew 11:43
21	what to draw on your leg?
22	A Yes.
23	Q How?
24	A I showed him a picture.
25	Q A picture of the tattoo? 11:43
	Page 66

1	A	I showed him a picture of a sticker.	
2	Q	Of a what?	
3	A	Of a sticker.	
4	Q)	Of a sticker?	
5	A	Yes.	11:43
6	Q	Okay. Where did you get that sticker?	
7	A	The sticker was located in the men's	
8	locker room	m of Compton Station.	
9	Q	And that sticker was that tattoo?	
10	A	Yes.	11:43
11	Q	How many stickers have you seen at the	
12	Compton Sta	ation?	
13	А	Just that one.	
14	Q	So let me make sure I have this correct.	
15	You saw one	e sticker in a locker room or on a locker.	11:44
16	Was it ins	ide the locker or	
17	A	Outside.	
18	Q	On the outside of a locker.	
19	A	Yeah.	
20	Q	And did you peel that sticker off?	11:44
21	A <mark>.</mark>	No. I took a picture of it.	
22	Q	Okay. On your phone? On your cell phone?	
23	A	Yes.	
24	Q	Okay. You took a picture of that.	
25	A	<mark>ďes.</mark>	11:44
			Page 67

1	Q And what did that strike that.	
2	And your testimony is you've never seen	
3	that sticker before?	
4	MR. ALTURA: Objection. Vague as to time.	
5	BY MR. SWEENEY:	11:44
6	Q Before you saw the one on the outside of	
7	the locker room?	
8	MR. ALTURA: Objection. Vague as to time.	
9	THE WITNESS: I'm unclear, sir. Can you	
10	rephrase.	11:44
11	BY MR. SWEENEY:	
12	Q Sure. Had you ever seen that sticker	
13	strike that.	
14	How many times have you seen that sticker	
15	on a locker at Compton Station?	11:45
16	A One sticker.	
17	Q And you go in that locker room every day	
18	when you were at Compton?	
19	A Not every day.	
20	Q How many days a week?	11:45
21	A Two times a week, three times a week.	
22	Q For five years; correct?	
23	A Yes.	
24	Q And you saw that sticker one time;	
25	correct?	11:45
		Page 68

1	A No. There is one sticker. And it has	
2	been there.	
3	Q Okay. When did you first notice that	
4	sticker?	
5	A Early 2015.	11:45
6	Q Did you ask anybody about that sticker	
7	once you saw it?	
8	A No.	
9	Q Did you want to know were you curious	
10	about what that sticker stood for?	11:46
11	MR. ALTURA: Objection. Assumes facts.	
12	THE WITNESS: I assumed it was a design	
13	affiliated with Compton Station. There's many	
14	designs.	
15	BY MR. SWEENEY:	11:46
16	Q There are many designs?	
17	A Yeah, at Compton Station	
18	Q At Compton Station?	
19	(A) (there's a lot of art.) (There's the CPT)	
20	logo. I saw this, this sticker. I saw the CPT on	11:46
21	the helmet. I saw the skeleton with the helmet with	
22	the flames. I thought it looked cool.	
23	Q You notice in picture No. 3 in Exhibit 51,	
24	take a close look at the stock of that AK-47. Do	
25	you see that?	11:47
		Page 69

1	A Uh-huh.
2	Q Number 38. Does yours have the number 38
3	on it?
4	A No.
5	Q Okay. What does 38 stand for if you know? 11:47
6	A I don't know, sir.
7	Q Do you know if that 38 is encrypted to
8	mean something?
9	A I don't know that.
10	Q That sticker did not have 38 on it; 11:47
11	correct?
12	A No.
13	Q Did you ask anybody when you first saw
14	that sticker, hey, what does this mean?
15	A No. Because I assumed myself that it had 11:48
16	to do something with it was just art. Art
17	from that was specific to Compton Station.
18	Q Did you have to be awarded this to wear
19	this tattoo by anyone?
20	A No. I got it myself. 11:48
21	Q Do you know if this is a group that is
22	known by captains, let's say, at the Compton
23	Station? If you know. If you know.
24	MR. IVIE: Objection. Assumes a fact not
25	established, and that is that there is some group. 11:49
	Page 70

1	The witness certainly hasn't testified that there
2	was a group.
3	MR. SWEENEY: I don't know how much more I
4	can establish. We have sworn testimony that there
5	are 10 to 15 10 to 20 people in this group with 11:49
6	the same tattoo.
7	MR. IVIE: So this witness hasn't
8	confirmed that testimony as being part of his
9	knowledge.
10	MR. SWEENEY: You said that it was not 11:49
11	established.
12	MR. IVIE: It's not established.
13	MR. SWEENEY: Not by him, but by Aldama.
14	MR. IVIE: Well, there can be argument
15	about that. I'm not going to argue what you think 11:49
16	you may or may not have established with Aldama.
17	But with this witness and in your examination of
18	this witness, that fact has not been established
19	that there is a group, that there is a group that
20	MR. SWEENEY: He hasn't admitted to a 11:50
21	group, Mr. Ivie, but it has been established there
22	is a group.
23	MR. IVIE: I disagree with you. But I'm
24	not going to go outside of the scope of this
25	testimony. With this witness you have not 11:50
	Page 71

1	established that fact. You have to establish a fact	
2	that	
3	MR. SWEENEY: Those are my words, "a	
4	group." I don't care what he calls it. Those are	
5	my words.	11:50
6	MR. IVIE: Okay. So he does not have to	
7	accept that in responding to your questions as being	
8	a fact.	
9	MR. SWEENEY: I'm not asking	
10	MR. IVIE: But you're asking that question	11:50
11	as though it were a fact.	
12	MR. SWEENEY: All right. Let's move on.	
13	Let's move on, Mr. Ivie.	
14	BY MR. SWEENEY:	
15	Q Okay. So did you ever ask a captain	11:50
16	whether or not it was okay for you to get this	
17	tattoo?	
18	(A) (No.)	
19	Q Did you ever ask anyone at the Compton	
20	Station what this symbolism means in this tattoo?	11:51
21	A No, I didn't.	
22	Q I bet you paid cash for your tattoo,	
23	didn't you?	
24	MR. IVIE: When you say "I bet," what does	
25	that mean? You bet who?	11:51
		Page 72

1	sure, that's all I know.	
2	Q You refreshed your recollection, you said,	
3	yesterday with your report?	
4	A Correct.	
5	Q Okay. Let me show you next in order is 0	2:25
6	55.	
7	THE COURT REPORTER: 54.	
8	MR. SWEENEY: 54.	
9	(Exhibit 54 was marked for identification.)	
10	BY MR. SWEENEY: 0	2:26
11	Q Let me show you Exhibit 54. And before I	
12	get to this document, let me ask you something.	
13	A Yes.	
14	Q Have you ever had any meetings with a	
15	group of deputies who have that similar tatoo that 0	2:27
16	you have?	
17	A No.	
18	Q Have you ever socialized with a group of	
19	deputies with that same tatoo?	
20	A No.	2:27
21	Q Were you ever told that you had to do	
22	something meritorious to get that tatoo?	
23	(Can you define "meritorious.")	
24	Q Something that's good in your work like	
25	making arrests, aggressive policing, anything like 0	2:28
	Page 8	36

1	that?	
2	A No.	
3	Q Were you told anything about what the	
4	qualifications were to get that tatoo?	
5	A No.	02:28
6	Q Captain Thatcher was your captain for a	
7	while at Compton; correct?	
8	A Yes.	
9	Q Did you ever tell him that you had that	
10	tatoo?	02:28
11	A I never told him.	
12	Q You never told him?	
13	A No.	
14	Q Did you ever ask him whether or not this	
15	was a sanctioned club within the Compton Station?	02:28
16	MR. IVIE: If what was a sanctioned club,	
17	Counsel?	
18	MR. SWEENEY: What's that?	
19	MR. IVIE: Objection. Lacks foundation,	
20	vague and ambiguous. You said have you ever told	02:29
21	him that	
22	MR. SWEENEY: You made your objection.	
23	MR. IVIE: this was a sanctioned club.	
24	What was a sanctioned club?	
25	MR. SWEENEY: The persons who got that	02:29
		Page 87

1	tatoo was a sanctioned club within the sheriff's	
2	department.	
3	THE WITNESS: I never asked Captain	
4	Thatcher anything.	
5	BY MR. SWEENEY: 02:29	
6	Q Did you ask anybody about that tatoo?	
7	A No.	
8	Q When you saw it? You just saw it on the	
9	locker and said I like that?	
10	A If I could explain, sir. 02:29	
11	Q Yes.	
12	A Working Compton, I realized what	
13	dedication and sacrifice entails working that	
14	station. And my time there, I became very proud in	
15	the difference that I was making, the positive role 02:30	
16	model that I was becoming. So I was actually	
17	looking in the market of getting something that	
18	represented my hard work, my accomplishments there.	
19	So I wasn't set on the tatoo design that I	
20	got. I was thinking of getting the Compton diamond. 02:30	
21	I was thinking of getting a quotation. (In the	
22	briefing room, there's a Latin term and it's in	
23	quotes. I was thinking about getting that. I was	
24	thinking about getting something much more specific	
25	to what I do and where I do it than just a thin blue 02:30	
	Page 88	

1	flag or a St. Michael, which is a very, very common	
2	generic law enforcement tatoo.	
3	So you decided to get a skeleton coming	
4	out of flames; correct?	
5	A Yes. I saw the sticker, I saw that they 02:31	
6	had CPT on the helmet, and, I mean, I thought it	
7	looked cool. It's cooler than any other art that I	
8	saw.	
9	Q Okay. You think it looked cool that that	
10	was a symbol of the station; is that your testimony? 02:31	
11	MR. IVIE: Well, he didn't testify as a	
12	symbol of the station, Counsel. Object to that.	
13	It's lacking foundation. He said it was something	
14	that was affiliated with.	
15	BY MR. SWEENEY: 02:31	
16	Q You can answer. Did you feel proud that	
17	that is a symbol of the station?	
18	A I felt I felt that's the art piece that	
19	I went with. And whatever art piece that I did go	
20	with, I was going to feel proud about. 02:32	
21	Q How do you feel about African-Americans in	
22	general?	
23	A The same as I feel about	
24	Hispanic-Americans and Caucasians.	
25	Q How many African-American friends do you 02:32	
	Page 89	

1	A To the best of my recollection, sir.	
2	Q Okay. All right. So how far was it from	
3	MLK out to the shooting scene out to the scene	
4	where the identification was to take place?	
5	A As far as distance?	02:48
6	Q Yes.	
7	A Three miles.	
8	Q I'm sorry. What?	
9	A Three miles.	
10	Q Okay. What did you talk about?	02:48
11	MR. IVIE: Objection. You assume that	
12	there was a conversation, Counsel.	
13	MR. SWEENEY: I'm asking him.	
14	THE WITNESS: What did I talk about with	
15	who?	02:48
16	BY MR. SWEENEY:	
17	Q With you were the only person in the	
18	car with Immunique; right?	
19	MR. IVIE: He has a radio. But again,	
20	you're assuming that there was a conversation.	02:48
21	BY MR. SWEENEY:	
22	Q What did you talk to about with Immunique	
23	Ross in that conversation from King Hospital out to	
24	the scene where she was to identify someone?	
25	A Okay. I understand now. Nothing.	02:48
		Page 102

1	Q No small talk?	
2	A We had a conversation in the emergency	
3	room. She agreed to come with us. We got in the	
4	car and I drove. It's a short drive.	
5	Q Did you ask her any preliminary questions	02:49
6	about what the guy had on, what he looked like?	
7	A No. I know the field pos-ID procedures	
8	are real touchy, and I just didn't, you know, want	
9	to participate other than transport.	
10	Q Your report goes on to say:	02:49
11	"During the field showup, victim	
12	Ross positively identified suspect	
13	Lockett as the person who shot at	
14	victim Cole and herself."	
15	You wrote that?	02:49
16	A Yes.	
17	Q And then it goes on to say:	
18	"Victim Ross stated 'Hell yeah,	
19	that's him. I put that on everything	
20	that's him.'"	02:49
21	She said that?	
22	A Yes.	
23	Q Tell me her demeanor. Was she angry that	
24	she was shot at?	
25	A Her demeanor at the emergency room?	02:50
		Page 103

1	BY MR. SWEENEY:	
2	Q But you were trained on how to document	
3	and what you needed to document in the academy;	
4	correct?	
5	A Yes.	03:32
6	Q Do you feel that you lived up to your	
7	teachings strike that.	
8	Do you feel that you followed your	
9	teachings that you learned in the academy on that	
10	day?	03:32
11	A Yes. Absolutely.	
12	Q Thank you. I have nothing further.	
13	MR. IVIE: I have nothing further. Same	
14	stipulation?	
15	MR. SWEENEY: Same stip. Okay.	03:32
16	THE COURT REPORTER: So we'll handle the	
17	transcript per the Federal Rules of Procedure. And	
18	copy for the County?	
19	MR. IVIE: Yes.	
20	MR. ALTURA: Yes, please.	03:32
21	THE VIDEOGRAPHER: This completes today's	
22	deposition. We're going off the record. The time	
23	is 3:33 p.m.	
24		
25	(The deposition concluded at 3:33 p.m.)	
		Page 123

1	I declare under penalty of perjury that the
2	foregoing is true and correct. Subscribed at
3	day of
4	, 2020.
5	
6	
7	
8	
9	
LO	DEPUTY ROGELIO BENZOR
L1	
L2	
L3	
L4	
L5	
L6	
L7	
L8	
L9	
20	
21	
22	
23	
24	
25	
	Page 124

1	Certification of Court Reporter
2	Federal Jurat
3	
4	I, the undersigned, Certified Shorthand Reporter
5	of the State of California, do hereby certify:
6	That the foregoing proceedings were taken before
7	me at the time and place herein set forth; that any
8	witnesses in the foregoing proceedings, prior to
9	testifying, were placed under oath; that a verbatim
10	record of the proceedings was made by me using machine
11	shorthand which was thereafter transcribed under my
12	direction; further, that the foregoing is an accurate
13	transcription thereof.
14	That before completion of the deposition, a
15	review of the transcript [] was [] was not requested.
16	I further certify that I am neither financially
L 7	interested in the action nor a relative or employee of
18	any attorney of any of the parties.
19	IN WITNESS WHEREOF I have hereunto subscribed my
20	name on March 16, 2020.
21	
22	Egabeth Schnidt
23	of January
	Elizabeth Schmidt
24	CSR No. 13598
25	
	Page 125
	rage 123